

N 12- 018

JAJ:MSA
F.#2012R00004

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

MICHAEL COKLEY,

AFFIDAVIT AND COMPLAINT IN
SUPPORT OF APPLICATION FOR
ARREST WARRANT

(T. 21 U.S.C. § 841(a)(1))

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

IVAN LAI, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

Upon information and belief, there is probable cause to believe that on or about October 4, 2011, within the Eastern District of New York, the defendant MICHAEL COKLEY did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Section 841(a)(1)).

The source of your deponent's information and the grounds for his belief are as follows:

1. I have been a Special Agent with the FBI for approximately 10 years. I currently am assigned to squad C-15, which investigates gang and narcotics offenses. The information below is based on my training, experience, interviews with

witnesses and law enforcement officials, and my review of the case files associated with this matter.

2. On October 4, 2011, the defendant reported to officers from the New York City Police Department ("NYPD") that he had been the victim of a gunpoint robbery inside his apartment in the Far Rockaway neighborhood of Queens, New York ("the apartment"). During an interview with police officers inside the apartment, the defendant further reported that the perpetrators restrained him with duct tape. One of the perpetrators took the defendant's automated teller machine ("ATM") card and personal identification number and left the apartment, while the other perpetrator held the defendant at gunpoint.

3. According to the defendant, the first perpetrator later returned and reported to his co-conspirator that everything was "okay." The perpetrators then left the apartment. The defendant reported that his ATM card had been used during the time period corresponding to the robbery without his permission.

4. While speaking with the defendant inside the apartment, officers noted the odor of marijuana and saw heroin in plain view. Upon obtaining and executing a search warrant, officers discovered inside approximately 34 grams of heroin, a stamp for labeling heroin for retail sales, four marijuana grinders, approximately 91 empty glassine envelopes and an electronic scale.

WHEREFORE, your deponent respectfully requests that a warrant be issued for the arrest of MICHAEL COKLEY so that he may be dealt with according to law.



Special Agent Ivan Lai
Federal Bureau of Investigation

Sworn to before me this
4th day of January 2012


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JUDGE
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